

EXHIBIT I

12/5/2024

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)
Individual and)
Representative)
Plaintiffs,)
)
v.) Case No.:
) 3:23-cv-03417-VC
META PLATFORMS, INC.,)
Defendant.)
)

** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **
Videotaped 30(b) (1) deposition of
NIKOLAY BASHLYKOV
Volume I

Thursday, December 5, 2024

London, England
United Kingdom

Reported stenographically by:
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1 individual or an organization tries to access a
2 website numerous times using the same IP address,
3 correct?

4 MR. WEINSTEIN: Object to form.

5 THE WITNESS: I think "distributed" means
6 that it is distributed in terms of IP ranges as well,
7 so....

8 BY MR. YOUNG:

9 Q. Okay, yes. I apologize.

10 So is IP throttling a defense mechanism
11 against DDoS?

12 MR. WEINSTEIN: Object to form.

13 THE WITNESS: It could be used for
14 different applications. I -- yeah, I don't know if
15 it's specifically for DDoS attack.

16 BY MR. YOUNG:

17 Q. Okay. But you recognize that IP
18 throttling could be an issue in acquiring a large
19 dataset, right?

20 A. It could be, yes, as I was mentioning
21 here.

22 Q. Okay. And it would be a problem because

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1 LibGen would limit the speed at which you would be
2 able to download it, correct?

3 A. Correct.

4 Q. Do you recall how you got around IP
5 throttling by LibGen?

6 A. For which part? For sci-mag?

7 Q. Sorry?

8 A. For which part of LibGen?

9 Q. For any part of LibGen.

10 A. So I think this concerns only sci-mag.

11 Q. Yes. Well, let's limit it to sci-mag,
12 then. How did you get around the IP throttling
13 problem for sci-mag?

14 A. So sci-mag, I think it was downloaded in
15 chunks.

16 Q. Mmm-hmm. So did you just direct download
17 it in chunks?

18 A. What do you mean by "direct download it"?

19 Q. Is that how you got rid of -- got past
20 IP throttling, by chunking your downloads?

21 A. So I think sci-mag here was downloaded in
22 chunks through torrent protocol.

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1 Q. Okay. And we had talked about torrenting
2 earlier, right?

3 A. We did.

4 Q. Okay. And the issues with seeding, right?

5 A. We did.

6 Q. Okay. So in between April 19 and May 22,
7 2023, the decision was made to begin torrenting parts
8 of LibGen, correct?

9 A. Only refers to sci-mag.

10 Q. Okay. Well, was made with respect to
11 sci-mag at least, right?

12 A. Yes.

13 Q. Okay. Do you know who made that decision?

14 A. I do not know. It was probably discussed
15 during the meetings.

16 Q. Okay. But you did not unilaterally make
17 the decision to torrent, right?

18 A. I did not.

19 Q. Okay. Did you discuss with your managers
20 whether or not it was okay to begin torrenting parts
21 of LibGen?

22 A. I think I did.